

# **Exhibit C**

**From:** Jones, Phillip  
**Sent:** Thursday, December 12, 2024 8:49 AM  
**To:** Amber Boyd-Moorman; Lauren Thompson  
**Cc:** Earnhart, Tami  
**Subject:** Jackson v. Ivy Tech - Protective Order & Medical Records  
**Attachments:** Jackson - Ivy Tech - Protective Order Motion-c.doc; Jackson - Ivy Tech - Joint Proposed Protective Order-c.docx

Good Morning Counsel,

We note that Plaintiff has requested a protective order before Plaintiff will provide Defendant with her medical records referenced in Defendant's Requests for Production Nos. 30 and 31. Attached to this email is a proposed protective order and accompanying motion for your review. The protective order is based on the Southern District's Uniform Stipulated Protective Order.

Your responses to RFP Nos. 30 and 31 also indicate that you are obtaining the requested records from Plaintiff's healthcare providers and will produce the records once a protective order has been entered. Have those requests already been made? If so, we would like to get copies of the records request sent to each healthcare provider indicated in Plaintiff's response to Interrogatory Nos. 7 and 8. We generally prefer to request the records ourselves to avoid delays, but have no objection to you doing so as long as we know what records were requested and receive copies of the records produced by the healthcare provider in full, without redaction. It would be helpful if you request and receive a business records certification of the number of pages produced and/or you send a cover page from the medical provider containing that information.

It is important that we receive the requested records no later than **January 3, 2025** so that we can review them prior to the deposition on the 14th. If you are having problems obtaining records from any of the healthcare providers, we ask that you let us know no later than December 30<sup>th</sup>.

Please let us know if you have any questions or would like to discuss this matter further. As we would like to avoid any delays, please confirm whether you agree to provide the information requested and communicate with us as to the status of the records requests.

Thank you,

Phillip Jones | Associate

**IceMiller**

P 317-236-2423

One American Square Suite 2900 Indianapolis, IN 46282-0200

Phillip.Jones@icemiller.com | [icemiller.com](https://www.icemiller.com)

**From:** [Amber Boyd-Moorman](#)  
**To:** [Jones, Phillip](#)  
**Cc:** [Lauren Thompson](#); [Earnhart, Tami](#)  
**Subject:** Re: Jackson v. Ivy Tech - Protective Order & Medical Records  
**Date:** Tuesday, December 17, 2024 7:55:21 AM  
**Attachments:** [image001.png](#)

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Phillip,

I hope all is well. This looks good. Please file. I won't be able to confirm receipt until January 6, 2025 because I do not return to the office until that day.

Best,

ABM

On Thu, Dec 12, 2024 at 8:48 AM [Phillip.Jones@icemiller.com](mailto:Phillip.Jones@icemiller.com) <[Phillip.Jones@icemiller.com](mailto:Phillip.Jones@icemiller.com)> wrote:

Good Morning Counsel,

We note that Plaintiff has requested a protective order before Plaintiff will provide Defendant with her medical records referenced in Defendant's Requests for Production Nos. 30 and 31. Attached to this email is a proposed protective order and accompanying motion for your review. The protective order is based on the Southern District's Uniform Stipulated Protective Order.

Your responses to RFP Nos. 30 and 31 also indicate that you are obtaining the requested records from Plaintiff's healthcare providers and will produce the records once a protective order has been entered. Have those requests already been made? If so, we would like to get copies of the records request sent to each healthcare provider indicated in Plaintiff's response to Interrogatory Nos. 7 and 8. We generally prefer to request the records ourselves to avoid delays, but have no objection to you doing so as long as we know what records were requested and receive copies of the records produced by the healthcare provider in full, without redaction. It would be helpful if you request and receive a business records certification of the number of pages produced and/or you send a cover page from the medical provider containing that information.

It is important that we receive the requested records no later than **January 3, 2025** so that we can review then prior to the deposition on the 14th. If you are having problems obtaining records from any of the healthcare providers, we ask that you let us know no later than December 30<sup>th</sup>.

Please let us know if you have any questions or would like to discuss this matter further. As we would like to avoid any delays, please confirm whether you agree to provide the information requested and communicate with us as to the status of the records requests.

**From:** [Amber Boyd-Moorman](#)  
**To:** [Jones, Phillip](#)  
**Subject:** Re: Jackson v. Ivy Tech - Protective Order & Medical Records  
**Date:** Tuesday, December 17, 2024 11:22:37 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Phillip,

We are sending the requests today. It may be best to reschedule Plaintiff's deposition because I don't believe the records will be received before the deposition.

Plaintiff is also open to rescheduling the depositions of Atkinson and McNichols.

Best,

ABM

On Tue, Dec 17, 2024 at 11:12 AM [Phillip.Jones@icemiller.com](mailto:Phillip.Jones@icemiller.com) <[Phillip.Jones@icemiller.com](mailto:Phillip.Jones@icemiller.com)> wrote:

Hi Amber,

Thank you for approving the Protective Order. We will file it today.

We wanted to confirm that you will not be able to pursue the medical records (if a provider has not produced them) until January 6? Given Plaintiff's January 14 deposition date, we do not believe there would be enough time to follow-up and receive the records if they are not already produced by January 6. If this is the case, we would like to request the medical records ourselves and request that you provide signed copies of the attached authorization for each healthcare provider identified in Plaintiff's responses to Interrogatory Nos. 7 and 8.

We also request that you confirm whether you have already sent medical records requests to Plaintiff's healthcare providers in response to our discovery requests and ask that you send us a copy of any medical records requests you have already sent, along with any records you have already received.

Please let us know if you have any questions or would like to schedule a call to discuss this further. Given the impending deadlines, it is important that we proceed with pursuing the medical records as soon as possible.

Thank you,

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**From:** Jones, Phillip  
**Sent:** Tuesday, January 7, 2025 3:22 PM  
**To:** Amber Boyd-Moorman  
**Cc:** Earnhart, Tami  
**Subject:** RE: Jackson v. Ivy Tech - Protective Order & Medical Records

Hi Amber,

We are happy to take your trial date into consideration. When does the trial start and how long is it expected to last?

Phillip Jones | Associate

**IceMiller**

P 317-236-2423

One American Square Suite 2900 Indianapolis, IN 46282-0200

Phillip.Jones@icemiller.com | [icemiller.com](https://icemiller.com)

---

**From:** Amber Boyd-Moorman <[amber@amberboydlaw.com](mailto:amber@amberboydlaw.com)>  
**Sent:** Tuesday, January 7, 2025 2:40 PM  
**To:** Jones, Phillip <[Phillip.Jones@icemiller.com](mailto:Phillip.Jones@icemiller.com)>  
**Cc:** Earnhart, Tami <[Tami.Earnhart@icemiller.com](mailto:Tami.Earnhart@icemiller.com)>  
**Subject:** Re: Jackson v. Ivy Tech - Protective Order & Medical Records

Phillip,

I will reschedule the depositions. I think it may be best to schedule the depositions after my February 2025 trial. Are you open to scheduling all depositions in mid-March?

Best,

ABM

On Tue, Jan 7, 2025 at 2:35 PM [Phillip.Jones@icemiller.com](mailto:Phillip.Jones@icemiller.com) <[Phillip.Jones@icemiller.com](mailto:Phillip.Jones@icemiller.com)> wrote:

Hi Amber,

We wanted to follow-up on the below regarding rescheduling Plaintiff and Atkinson/McNichols' depositions while we wait on Plaintiff's medical records.

We received calendar invites from the court reporter and wanted to make sure these depositions were being rescheduled.

Again, we are tentatively targeting February 12<sup>th</sup> or 13<sup>th</sup> to reschedule Plaintiff's deposition and February 17<sup>th</sup> and/or 18<sup>th</sup> to reschedule Atkinson and McNichols' depositions, if that also works for you.

Please confirm availability on your end, and we will do the same.

Thanks,

Phillip Jones | Associate

**IceMiller**

P 317-236-2423

One American Square Suite 2900 Indianapolis, IN 46282-0200

Phillip.Jones@icemiller.com | [icemiller.com](https://icemiller.com)

---

**From:** Jones, Phillip  
**Sent:** Friday, December 20, 2024 2:28 PM  
**To:** Amber Boyd-Moorman <[amber@amberboydlaw.com](mailto:amber@amberboydlaw.com)>  
**Cc:** Earnhart, Tami <[Tami.Earnhart@icemiller.com](mailto:Tami.Earnhart@icemiller.com)>  
**Subject:** RE: Jackson v. Ivy Tech - Protective Order & Medical Records

Hi Amber,

We agree that it is likely necessary to reschedule the deposition to ensure sufficient time to obtain the records in advance of the deposition.

We are working on confirming availability on our end, but are tentatively targeting February 12<sup>th</sup> or 13<sup>th</sup> to reschedule Plaintiff's deposition and February 17<sup>th</sup> and/or 18<sup>th</sup> to reschedule Atkinson and McNichols' depositions, if that also works for you.

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**From:** Jones, Phillip  
**Sent:** Thursday, February 6, 2025 10:41 AM  
**To:** Amber Boyd-Moorman  
**Cc:** Earnhart, Tami  
**Subject:** RE: Jackson v. Ivy Tech - Protective Order & Medical Records

Hi Amber,

We are following up on the status of Plaintiff's medical records and request that you produce Plaintiff's medical records no later than **Tuesday, February 11, 2025**. Additionally, we request that you produce copies of any medical records requests that you sent to each of Plaintiff's medical providers identified in Plaintiff's responses to Defendant's Interrogatory Nos. 7 and 8, along with all correspondence from the medical providers in response to your records requests. Such correspondence may include but is not limited to business records certifications of the number of pages produced in response to Plaintiff's records requests, email communications with Plaintiff's medical providers, and/or cover sheets for any faxes received from Plaintiff's medical providers.

We look forward to receiving this information by **Tuesday, February 11**, so that we may have time to follow-up on any issues with Plaintiff's medical records in advance of Plaintiff's March 11 deposition.

Thank you,

Phillip Jones | Associate

**IceMiller**

P 317-236-2423

One American Square Suite 2900 Indianapolis, IN 46282-0200

Phillip.Jones@icemiller.com | [icemiller.com](https://www.icemiller.com)

---

**From:** Amber Boyd-Moorman <amber@amberboydlaw.com>  
**Sent:** Tuesday, December 17, 2024 11:22 AM  
**To:** Jones, Phillip <Phillip.Jones@icemiller.com>  
**Subject:** Re: Jackson v. Ivy Tech - Protective Order & Medical Records

Phillip,

We are sending the requests today. It may be best to reschedule Plaintiff's deposition because I don't believe the records will be received before the deposition.

Plaintiff is also open to rescheduling the depositions of Atkinson and McNichols.

---

**From:** Jones, Phillip  
**Sent:** Friday, February 14, 2025 10:55 AM  
**To:** Amber Boyd-Moorman  
**Cc:** Earnhart, Tami  
**Subject:** RE: Jackson v. Ivy Tech - Protective Order & Medical Records

Hello Amber,

We are following up on the below. Please advise on the status of Plaintiff's medical records.

Thanks,

Phillip Jones | Associate

**IceMiller**

P 317-236-2423

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Phillip.Jones@icemiller.com | [icemiller.com](https://icemiller.com)

---

**From:** Jones, Phillip  
**Sent:** Thursday, February 6, 2025 10:41 AM  
**To:** Amber Boyd-Moorman <amber@amberboydlaw.com>  
**Cc:** Earnhart, Tami <Tami.Earnhart@icemiller.com>  
**Subject:** RE: Jackson v. Ivy Tech - Protective Order & Medical Records

Hi Amber,

We are following up on the status of Plaintiff's medical records and request that you produce Plaintiff's medical records no later than **Tuesday, February 11, 2025**. Additionally, we request that you produce copies of any medical records requests that you sent to each of Plaintiff's medical providers identified in Plaintiff's responses to Defendant's Interrogatory Nos. 7 and 8, along with all correspondence from the medical providers in response to your records requests. Such correspondence may include but is not limited to business records certifications of the number of pages produced in response to Plaintiff's records requests, email communications with Plaintiff's medical providers, and/or cover sheets for any faxes received from Plaintiff's medical providers.

We look forward to receiving this information by **Tuesday, February 11**, so that we may have time to follow-up on any issues with Plaintiff's medical records in advance of Plaintiff's March 11 deposition.

Thank you,

Phillip Jones | Associate

**IceMiller**

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Phillip.Jones@icemiller.com | [icemiller.com](https://icemiller.com)



---

**From:** Jones, Phillip  
**Sent:** Tuesday, February 18, 2025 12:58 PM  
**To:** Amber Boyd-Moorman  
**Cc:** Earnhart, Tami; Lauren Thompson  
**Subject:** RE: Jackson v. Ivy Tech - Protective Order & Medical Records

**Importance:** High

Hello Amber,

Please provide Plaintiff's medical records by tomorrow, **February 19, 2025**. If you do not plan to produce Plaintiff's medical records by tomorrow, then please provide your availability to schedule a call with the Court to discuss Plaintiff's inability to produce her medical records in a timely fashion consistent with the federal rules.

This request includes copies of any medical records requests that you sent to each of Plaintiff's medical providers identified in Plaintiff's responses to Defendant's Interrogatory Nos. 7 and 8, along with all correspondence from the medical providers in response to your records requests. Such correspondence may include but is not limited to business records certifications of the number of pages produced in response to Plaintiff's records requests, email communications with Plaintiff's medical providers, and/or cover sheets for any faxes received from Plaintiff's medical providers.

Thank you,

Phillip Jones | Associate

**IceMiller**

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One American Square Suite 2900 Indianapolis, IN 46282-0200

Phillip.Jones@icemiller.com | [icemiller.com](https://www.icemiller.com)

---

**From:** Jones, Phillip  
**Sent:** Friday, February 14, 2025 10:55 AM  
**To:** Amber Boyd-Moorman <amber@amberboydlaw.com>  
**Cc:** Earnhart, Tami <Tami.Earnhart@icemiller.com>  
**Subject:** RE: Jackson v. Ivy Tech - Protective Order & Medical Records

Hello Amber,

We are following up on the below. Please advise on the status of Plaintiff's medical records.

Thanks,

Phillip Jones | Associate

**IceMiller**

P 317-236-2423

---

**From:** Jones, Phillip  
**Sent:** Thursday, February 20, 2025 2:30 PM  
**To:** Amber Boyd-Moorman  
**Cc:** Earnhart, Tami; Lauren Thompson  
**Subject:** RE: Jackson v. Ivy Tech - Protective Order & Medical Records

Counsel,

Pursuant to Local Rule 37-1, please provide your availability to schedule a call with the Court to discuss the status of Plaintiff's medical records. Based on your inability to produce the requested records in a timely fashion and refusal to respond to our emails regarding same, we do not believe any further attempts to confer on this issue are necessary. Please provide your availability on February 24, 25, and 28, and we will confirm availability with the Court.

Thank you,

Phillip Jones | Associate



P 317-236-2423

One American Square Suite 2900 Indianapolis, IN 46282-0200

Phillip.Jones@icemiller.com | [icemiller.com](https://www.icemiller.com)

---

**From:** Jones, Phillip  
**Sent:** Tuesday, February 18, 2025 12:58 PM  
**To:** 'Amber Boyd-Moorman' <amber@amberboydlaw.com>  
**Cc:** Earnhart, Tami <Tami.Earnhart@icemiller.com>; Lauren Thompson <lauren@amberboydlaw.com>  
**Subject:** RE: Jackson v. Ivy Tech - Protective Order & Medical Records  
**Importance:** High

Hello Amber,

Please provide Plaintiff's medical records by tomorrow, **February 19, 2025**. If you do not plan to produce Plaintiff's medical records by tomorrow, then please provide your availability to schedule a call with the Court to discuss Plaintiff's inability to produce her medical records in a timely fashion consistent with the federal rules.

This request includes copies of any medical records requests that you sent to each of Plaintiff's medical providers identified in Plaintiff's responses to Defendant's Interrogatory Nos. 7 and 8, along with all correspondence from the medical providers in response to your records requests. Such correspondence may include but is not limited to business records certifications of the number of pages produced in response to Plaintiff's records requests, email communications with Plaintiff's medical providers, and/or cover sheets for any faxes received from Plaintiff's medical providers.

Thank you,

Phillip Jones | Associate

---

**From:** Jones, Phillip  
**Sent:** Monday, February 24, 2025 11:47 AM  
**To:** Amber Boyd-Moorman  
**Cc:** Earnhart, Tami; Lauren Thompson  
**Subject:** RE: Jackson v. Ivy Tech - Protective Order & Medical Records

**Importance:** High

Counsel,

As you have not responded to the below request for your availability, I will contact the Court and request that a conference be set without the benefiting of knowing your availability.

Best,

Phillip Jones | Associate

**IceMiller**

P 317-236-2423

One American Square Suite 2900 Indianapolis, IN 46282-0200

Phillip.Jones@icemiller.com | [icemiller.com](https://www.icemiller.com)

---

**From:** Jones, Phillip  
**Sent:** Thursday, February 20, 2025 2:30 PM  
**To:** Amber Boyd-Moorman <amber@amberboydlaw.com>  
**Cc:** Earnhart, Tami <Tami.Earnhart@icemiller.com>; Lauren Thompson <lauren@amberboydlaw.com>  
**Subject:** RE: Jackson v. Ivy Tech - Protective Order & Medical Records

Counsel,

Pursuant to Local Rule 37-1, please provide your availability to schedule a call with the Court to discuss the status of Plaintiff's medical records. Based on your inability to produce the requested records in a timely fashion and refusal to respond to our emails regarding same, we do not believe any further attempts to confer on this issue are necessary. Please provide your availability on February 24, 25, and 28, and we will confirm availability with the Court.

Thank you,

Phillip Jones | Associate

**IceMiller**

P 317-236-2423

One American Square Suite 2900 Indianapolis, IN 46282-0200

Phillip.Jones@icemiller.com | [icemiller.com](https://www.icemiller.com)

---

**From:** Amber Boyd-Moorman <amber@amberboydlaw.com>  
**Sent:** Monday, February 24, 2025 12:19 PM  
**To:** Jones, Phillip  
**Cc:** Earnhart, Tami; Lauren Thompson  
**Subject:** Re: Jackson v. Ivy Tech - Protective Order & Medical Records

Phillip when I responded last week it went to my staff only. I am in the middle of a 4 day trial. I will call you at the end of the week to discuss.

ABM



**CONFIDENTIALITY NOTICE:**

This e-mail and any attachments are confidential and may be protected by legal privilege. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of this e-mail or any attachment is prohibited. If you have received this e-mail in error, please notify us immediately by returning it to the sender and delete this copy from your system. Thank you.

On Mon, Feb 24, 2025 at 11:46 AM [Phillip.Jones@icemiller.com](mailto:Phillip.Jones@icemiller.com) <[Phillip.Jones@icemiller.com](mailto:Phillip.Jones@icemiller.com)> wrote:

Counsel,

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Best,

Phillip Jones | Associate

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P 317-236-2423

One American Square Suite 2900 Indianapolis, IN 46282-0200

[Phillip.Jones@icemiller.com](mailto:Phillip.Jones@icemiller.com) | [icemiller.com](http://icemiller.com)

---

**From:** Jones, Phillip  
**Sent:** Tuesday, March 4, 2025 2:30 PM  
**To:** Amber Boyd-Moorman  
**Cc:** Earnhart, Tami; Lauren Thompson  
**Subject:** RE: Jackson v. Ivy Tech - Protective Order & Medical Records

Amber,

I did not receive a call this morning. I called and left another message with Natasha for you to give me a call.

I will be available from 3 to 4 p.m. this afternoon for a call. If I do not hear from you, I will need to call the Court and ask for them to set a discovery conference. We also need to move depositions and deadlines in this case since we have not had an opportunity to review Plaintiff's medical records in advance of her deposition this week.

I hope to speak to you this afternoon.

Thanks,

Phillip Jones | Associate

**IceMiller**

P 317-236-2423

One American Square Suite 2900 Indianapolis, IN 46282-0200

Phillip.Jones@icemiller.com | [icemiller.com](https://www.icemiller.com)

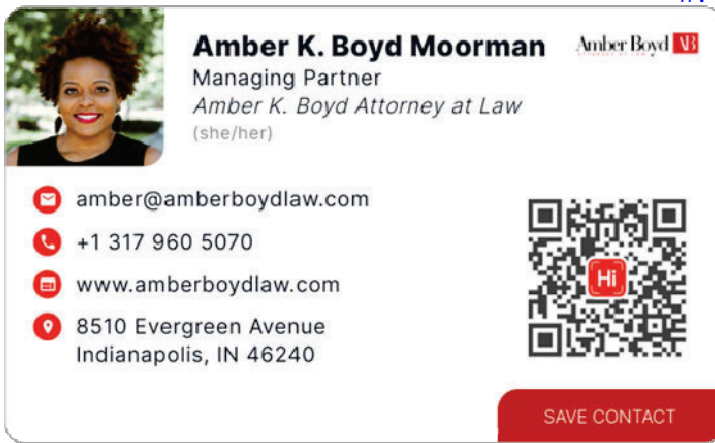
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**From:** Amber Boyd-Moorman <amber@amberboydlaw.com>  
**Sent:** Monday, March 3, 2025 5:44 PM  
**To:** Jones, Phillip <Phillip.Jones@icemiller.com>  
**Cc:** Earnhart, Tami <Tami.Earnhart@icemiller.com>; Lauren Thompson <lauren@amberboydlaw.com>  
**Subject:** Re: Jackson v. Ivy Tech - Protective Order & Medical Records

Phillip,

Thank you for reaching out. I'll give you a call tomorrow morning.

ABM

**CONFIDENTIALITY NOTICE:**

This e-mail and any attachments are confidential and may be protected by legal privilege. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of this e-mail or any attachment is prohibited. If you have received this e-mail in error, please notify us immediately by returning it to the sender and delete this copy from your system. Thank you.

On Mon, Mar 3, 2025 at 3:53 PM [Phillip.Jones@icemiller.com](mailto:Phillip.Jones@icemiller.com) <[Phillip.Jones@icemiller.com](mailto:Phillip.Jones@icemiller.com)> wrote:

Hi Amber,

I did not receive a call on Friday, and I have called your office twice today and left messages with reception.

Please call me back to discuss this issue as soon as possible.

Thanks,

**Phillip Jones** | Associate

**IceMiller**

P 317-236-2423

One American Square Suite 2900 Indianapolis, IN 46282-0200

[Phillip.Jones@icemiller.com](mailto:Phillip.Jones@icemiller.com) | [icemiller.com](http://icemiller.com)

---

**From:** Amber Boyd-Moorman <[amber@amberboydlaw.com](mailto:amber@amberboydlaw.com)>

**Sent:** Monday, February 24, 2025 12:19 PM

**To:** Jones, Phillip <[Phillip.Jones@icemiller.com](mailto:Phillip.Jones@icemiller.com)>

---

**From:** Jones, Phillip  
**Sent:** Friday, March 7, 2025 2:54 PM  
**To:** Amber Boyd-Moorman  
**Cc:** Earnhart, Tami; Lauren Thompson  
**Subject:** RE: Jackson v. Ivy Tech - Protective Order & Medical Records

Hi Amber,

Per our call this past Tuesday, March 4, please provide your and Ms. Jackson's availability in April to reschedule Ms. Jackson and Stacy Atkinson's depositions. We are working on getting availability on our end as well.

We also wanted to confirm that you will be producing Ms. Jackson's medical records today as discussed during our call.

Thanks,

Phillip Jones | Associate

**IceMiller**

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Phillip.Jones@icemiller.com | [icemiller.com](https://www.icemiller.com)

---

**From:** Jones, Phillip  
**Sent:** Tuesday, March 4, 2025 2:30 PM  
**To:** Amber Boyd-Moorman <[amber@amberboydlaw.com](mailto:amber@amberboydlaw.com)>  
**Cc:** Earnhart, Tami <[Tami.Earnhart@icemiller.com](mailto:Tami.Earnhart@icemiller.com)>; Lauren Thompson <[lauren@amberboydlaw.com](mailto:lauren@amberboydlaw.com)>  
**Subject:** RE: Jackson v. Ivy Tech - Protective Order & Medical Records

Amber,

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I hope to speak to you this afternoon.

Thanks,

Phillip Jones | Associate

**IceMiller**

P 317-236-2423

One American Square Suite 2900 Indianapolis, IN 46282-0200

---

**From:** Amber Boyd-Moorman <amber@amberboydlaw.com>  
**Sent:** Monday, March 10, 2025 4:39 PM  
**To:** Jones, Phillip  
**Cc:** Earnhart, Tami; Lauren Thompson  
**Subject:** Re: Jackson v. Ivy Tech - Protective Order & Medical Records

I received the medical records today; I will send them to you tomorrow morning along with the draft motion to extend.

Best,

ABM

On Fri, Mar 7, 2025 at 2:54 PM [Phillip.Jones@icemiller.com](mailto:Phillip.Jones@icemiller.com) <[Phillip.Jones@icemiller.com](mailto:Phillip.Jones@icemiller.com)> wrote:

Hi Amber,

Per our call this past Tuesday, March 4, please provide your and Ms. Jackson's availability in April to reschedule Ms. Jackson and Stacy Atkinson's depositions. We are working on getting availability on our end as well.

We also wanted to confirm that you will be producing Ms. Jackson's medical records today as discussed during our call.

Thanks,

Phillip Jones | Associate

**IceMiller**

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One American Square Suite 2900 Indianapolis, IN 46282-0200

[Phillip.Jones@icemiller.com](mailto:Phillip.Jones@icemiller.com) | [icemiller.com](http://icemiller.com)



**From:** martina@amberboydlaw.com on behalf of Amber Boyd-Moorman <amber@amberboydlaw.com>  
**Sent:** Tuesday, March 11, 2025 2:25 PM  
**To:** Jones, Phillip  
**Cc:** Earnhart, Tami; Lauren Thompson  
**Subject:** Re: Jackson v. Ivy Tech - Protective Order & Medical Records

Good Day Phillip

Atty Amber and Ms Jackson are available for either April 1 or April 17 to coordinate availability. Ms Jackson has suggested April 17 as her preference. But with either which date that is left open, Ms Atkinson can be deposed on that date.

Kind regards



On Mon, Mar 10, 2025 at 10:39 PM Amber Boyd-Moorman <[amber@amberboydlaw.com](mailto:amber@amberboydlaw.com)> wrote:  
I received the medical records today; I will send them to you tomorrow morning along with the draft motion to extend.

Best,

ABM

On Fri, Mar 7, 2025 at 2:54 PM [Phillip.Jones@icemiller.com](mailto:Phillip.Jones@icemiller.com) <[Phillip.Jones@icemiller.com](mailto:Phillip.Jones@icemiller.com)> wrote:

Hi Amber,

Per our call this past Tuesday, March 4, please provide your and Ms. Jackson's availability in April to reschedule Ms. Jackson and Stacy Atkinson's depositions. We are working on getting availability on our end as well.

We also wanted to confirm that you will be producing Ms. Jackson's medical records today as discussed during our call.

**From:** Amber Boyd-Moorman <amber@amberboydlaw.com>  
**Sent:** Thursday, March 13, 2025 11:22 AM  
**To:** Jones, Phillip; Earnhart, Tami; Lauren Thompson  
**Subject:** Jackson/Ivy Tech - Medical Records and Motion to Extend Case Deadlines  
**Attachments:** Tracey\_Jackson\_-\_Order\_Granteeing\_Extension\_.docx;  
Tracy\_Jackson\_-\_Motion\_for\_Extension\_fo\_Case\_Management\_Deadlines.docx;  
ReleaseofMedicalRecords\_from\_Kala\_Dickerson.pdf; Medical\_Records\_from\_Sarah\_Myers.pdf

Phillip,

I hope all is well. Please see the attached motion to extend the case management deadlines and the Plaintiff's medical records. We are still waiting on the records from two of the practitioners.

Best,

ABM

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This e-mail and any attachments are confidential and may be protected by legal privilege. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of this e-mail or any attachment is prohibited. If you have received this e-mail in error, please notify us immediately by returning it to the sender and delete this copy from your system. Thank you.

---

**From:** Jones, Phillip  
**Sent:** Thursday, March 20, 2025 2:33 PM  
**To:** Martina Clark; Amber Boyd-Moorman  
**Cc:** Earnhart, Tami; Lauren Thompson  
**Subject:** RE: Jackson v. Ivy Tech - Protective Order & Medical Records  
**Attachments:** 2025.03.20 - Ivy Tech v. Jackson - Notice of Deposition of Tracey Jackson-c.pdf

Hi Amber & Martina,

Please see attached the Notice of Deposition for Ms. Jackson's deposition on April 17.

I also wanted to follow-up on your availability for Ms. Atkinson's deposition. For your reference, we are no longer available on April 23, but are still available on April 22, 25, and 28.

Additionally, please let us know the status of Ms. Jackson's remaining medical records. If we do not receive the remaining medical records by this Monday, March 24, we will serve third-party subpoenas for the records. If you intend to object to these subpoenas and are not able to provide the medical records, then please let us know your availability for Monday and Tuesday to schedule a conference with the Court to discuss this discovery dispute.

Thanks,

Phillip Jones | Associate



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**From:** Jones, Phillip  
**Sent:** Monday, March 17, 2025 9:59 AM  
**To:** Amber Boyd-Moorman <[amber@amberboydlaw.com](mailto:amber@amberboydlaw.com)>  
**Cc:** Earnhart, Tami <[Tami.Earnhart@icemiller.com](mailto:Tami.Earnhart@icemiller.com)>; Lauren Thompson <[lauren@amberboydlaw.com](mailto:lauren@amberboydlaw.com)>  
**Subject:** RE: Jackson v. Ivy Tech - Protective Order & Medical Records

Hi Martina,

We are not available on April 1. Ms. Atkinson is not available on April 17.

We will notice Ms. Jackson's deposition for April 17.

Please let us know Ms. Boyd's availability on April 22, April 23 (a.m. start), April 25, and April 28 to schedule Ms. Atkinson's deposition.

Thank you,

Phillip Jones | Associate

**From:** [Jones, Phillip](#)  
**To:** [Amber Boyd-Moorman](#); [Lauren Thompson](#)  
**Cc:** [Earnhart, Tami](#)  
**Subject:** Tracey Jackson v. Ivy Tech - Plaintiff's Medical Records and Defendant's Motion to Vacate the Settlement Conference  
**Date:** Monday, March 24, 2025 6:00:00 PM  
**Attachments:** [image001.png](#)  
[Jackson - Ivy Tech - Subpoena to Community Physicians Network ENT Dr. Samuel Harmon \(4933-2041-5534.v1\)-c.pdf](#)  
[Jackson - Ivy Tech - Subpoena to Community Health Network PCP Dr. Danyelle Loveless \(4919-6722-6158.v1\)-c.pdf](#)  
[Jackson - Ivy Tech - Exhibit A for Medical Records Subpoena \(4918-6138-6286.v1\)-c.docx](#)

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Amber,

We still have not received all of Plaintiff's medical records despite requesting the medical records in Defendant's Requests for Production on October 2, 2024, your statement that you requested the records on December 17, 2024, and our repeated requests that you produce the medical records on February 6, 14, 18, 20, 24, and March 3. On March 10, 2025, you stated that you received the medical records and would send them to us the following morning, March 11, 2025. On March 13, 2025, you only produced medical records from two of Plaintiff's four medical providers and stated you were still waiting on the records for the two other practitioners. We still have not received the outstanding medical records.

On March 20, 2025, we requested an update on Plaintiff's outstanding medical records and stated we would serve third-party subpoenas for the records if we did not receive them by today, March 24. We still have not received Plaintiff's medical records despite initially requesting them on October 2, 2024 and your representation that you had started the process of obtaining the records on December 17, 2024. **Tomorrow, we will serve the attached Notices of Subpoena for Plaintiff's medical records from the two outstanding medical providers identified therein.** As Plaintiff's deposition is scheduled for April 17, time is of the essence, and it is imperative that we receive the medical records in a timely fashion to avoid any further unnecessary and avoidable delays or rescheduling of depositions in this matter. The current date set for Plaintiff's deposition is the third date due to the ongoing delay in producing the medical records.

As a follow-up to our call this morning, I want to reiterate that the College objects to Plaintiff's motion to extend the case management deadlines by 90-days. We do not believe an extension of the case management deadlines is warranted. We believe all discovery can be completed by the May 22 discovery deadline and that this matter will be ready for any dispositive motions by the July 22 deadline. We appreciate the fact that you have a trial set for May 6, 2025, however, we do not agree that this trial warrants the rescheduling of the deadlines referenced in your motion. Moreover, I did not agree to extend the case management deadlines by 90 days during our call on March 4. Rather, I only asked that you prepare a motion for extension with proposed extended deadlines for Tami and I's review, and we would consider any new dates and let you know whether we have any objections. I reiterated this point to Lauren during a subsequent call wherein I similarly suggested we would likely object to such broad extensions to the case management deadlines.

Finally, as I stated on our call this morning, the College intends to file a motion to vacate the settlement conference currently set for April 8. We do not believe a settlement conference in this

matter would be a good use of the Parties or Court's resources given Plaintiff's settlement demand and the rescheduling of depositions in this matter. We will note that Plaintiff objects to our motion.

Best,

Phillip Jones | Associate

**Ice**Miller

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